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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Advanta Bank Corp. as assignee of	:	
Preferred Capital Corporation	:	
1020 Laurel Oak Road,	:	
Voorhees, New Jersey 08043	:	
	:	
v. Plaintiff,	:	CIVIL ACTION NO: 02 cv 4054
	:	
R.R. Blimline, Inc., and Raymond Blimline	:	
3305 Penn Avenue	:	
West Lawn, PA 19609	:	
	:	
Defendants.	:	NOTICE OF MOTION

The Plaintiff Advanta Bank Corp. moves the court as follows:

1. For Judgment in favor of Plaintiff and against Defendants for Failure to Comply with the Terms of Settlement.

Notice of Motion

TO: Shawn J. Lau, Esquire
Attorney for Defendant

4228 St. Lawrence Avenue
Reading, Pennsylvania 19606

Please take notice, that the undersigned will bring the above motion on hearing before this court at Room_____, United States Court House, For the Eastern District of Pennsylvania, on the _____ day of _____, 2003, at 10:00 a.m. or as soon thereafter as counsel can be heard.

Signed: _____
Ivy M. Kempf, Esquire

Address: 1420 Walnut Street, Suite 810
Philadelphia, Pa 19193